

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

=====X
"I.P. DOE", an Infant, by his/her Mother and Natural
Guardian, MARNI ASKINAZY, and MARNI ASKINAZY
and MATTHEW ASKINAZY, Individually,

Plaintiff,

-against-

***DEFENDANT'S FIRST SET
OF INTERROGATORIES TO
PLAINTIFFS***

Docket #15 CV 778

LOKANDA LION, LLC, individually and d/b/a CAMP
LOKANDA, CAMP LOKANDA, AMERICAN INSTITUTE
FOR FOREIGN STUDY, individually and d/b/a CAMP
AMERICA USA, CAMP AMERICA, USA, and "JOHN/JANE
DOES" 1-10, names fictitious and unknown, persons intended
being camp counselors at Camp Lokanda during the summer
of 2014

Defendant.

=====X
Defendant, AMERICAN INSTITUTE FOR FOREIGN STUDY, INC., individually and
d/b/a CAMP AMERICA USA, and also s/h/a CAMP AMERICA, USA, pursuant to Local Civil
Rule 33.3(a), demands that plaintiff serve answers to the following interrogatories:

1. Set forth a general statement as to the alleged acts of negligence by each defendant.
2. The names of witnesses with knowledge relevant to the subject matter of the action.
3. State whether it will be claimed that the defendants had actual or constructive notice of each condition, thing or defect alleged to have caused plaintiff's injury with respect thereto, set forth:
 - a. if actual notice is claimed, state each person who gave such notice and the names of each person who received same;

b. if actual notice is claimed, and it will be alleged that the defendant created the condition, set forth the condition created, who in the employ or under the control of the defendant created the condition and when it was created;

c. if constructive notice is claimed, set forth the length of time each condition, thing or defect existed.

4. Set forth each category of injury alleged by plaintiff.
5. The computation of each category of damages alleged;
6. Set forth the computation of each category of special damages alleged.
7. Set forth the existence, custodian, location and general description of any documentary or physical evidence plaintiff intends to offer at the time of trial.

Dated: New York, New York
March 24, 2015

Yours etc.,

PERRY, VAN ETTEN, ROZANSKI
& PRIMAVERA, LLP
Attorneys for Defendant
AMERICAN INSTITUTE FOR FOREIGN
STUDY, INC., individually and d/b/a CAMP
AMERICA USA, and also s/h/a CAMP
AMERICA, USA,
Office & P.O. Address
30 Broad Street
The 44th Floor
New York, New York 10004
(212) 406-9710
Our File Number: 50/459

BY: _____
JEFFREY K. VAN ETTEN
(#9107)

TO: PARKER WAICHMAN LLP
Attorneys for Plaintiffs
6 Horbor Park Drive
Port Washington, New York 11050
(516) 466-6500
Your File Number: 4023142

LOKANDA LION, LLC, individually and d/b/a CAMP LOKANDA
and CAMP LOKANDA
432 Haring Road
Glen Spey, New York 12737

AFFIDAVIT OF SERVICE BY ECF AND REGULAR MAIL

STATE OF NEW YORK)
: ss.
COUNTY OF NEW YORK)

LISA BYE, being duly sworn deposes and says:

Deponent is not a party to the action, is over Eighteen (18) years of age and resides in Richmond County, New York.

On March 24, 2015 deponent served the within ***NOTICE TO TAKE DEPOSITION UPON ORAL EXAMINATION, DEFENDANT'S FIRST OF INTERROGATORIES TO PLAINTIFF, NOTICE FOR PRODUCTION OF DOCUMENTS***

upon the attorneys listed below through the ECF System of the United States District Court for the Southern District of New York via the permissive use of the user name and password of JEFFREY K. VAN ETTEN, ESQ., and by depositing a true copy of same enclosed in a post-paid addressed wrapper in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York directed to the attorneys listed below at the address designated by said attorneys for the purpose of service.

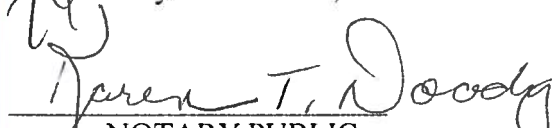
TO: PARKER WAICHMAN LLP
Attorneys for Plaintiffs
6 Harbor Park Drive
Port Washington, New York 11050
(516) 466-6500
Your File Number: 4023142

LOKANDA LION, LLC, individually and d/b/a CAMP LOKANDA
and CAMP LOKANDA
432 Haring Road
Glen Spey, New York 12737



LISA BYE

Sworn to before me this
24 day of March 23, 2015



NOTARY PUBLIC

KAREN T. DOODY
Notary Public, State Of New York
01004662671
Qualified In Queens County
Commission Expires July 31, 2017

UNITED STATES DISTRICT COURT : SOUTHERN DISTRICT COURT OF NEW YORK

"I.P. DOE", an Infant, by his/her Mother and Natural Guardian, MARNI ASKINAZY, and
MARNI ASKINAZY and MATTHEW ASKINAZY, Individually,

Plaintiffs,

-against-

LOKANDA LION, LLC., ET AL.,

Defendant.

**NOTICE TAKE DEPOSITION UPON ORAL EXAMINATION, DEFENDANT'S
FIRST SET OF INTERROGATORIES TO PLAINTIFF, NOTICE FOR PRODUCTION OF**

**DOCUMENTS
PERRY, VAN ET TEN, ROZANSKI &
PRIMAVERA, LLP**

Attorneys for

Defendant - AMERICAN INSTITUTE FOR FOREIGN STUDY
30 BROAD STREET, THE 44TH FLOOR
NEW YORK, NEW YORK 10004
a/k/a CAMP AMERICA
(212) 406-9710

§2103 (b) (5) Notice: Service of Papers by Electronic Means is Not Accepted

Pursuant to 22 NYCRR 130-1.1-a, the undersigned, an attorney admitted to practice in the courts of New York State, certifies that, upon information and belief and reasonable inquiry, (1) the contentions contained in the annexed document are not frivolous and that (2) if the annexed document is an initiating pleading, (i) the matter was not obtained through illegal conduct, or that if it was, the attorney or other persons responsible for the illegal conduct are not participating in the matter or sharing in any fee earned therefrom and that (ii) if the matter involves potential claims for personal injury or wrongful death, the matter was not obtained in violation of 22 NYCRR 1200.41-a.

Dated: March 24, 2015

Signature

JEFFREY K. VAN ET TEN

Print Signer's Name

Service of a copy of the within

is hereby admitted.

Dated:

Attorney(s) for

PLEASE TAKE NOTICE

Check Applicable Box

NOTICE OF
ENTRY

that the within is a (certified) true copy of a
entered in the office of the clerk of the within-named Court on

20

NOTICE OF
SETTLEMENT

that an Order of which the within is a true copy will be presented for settlement to the
Hon. _____, one of the judges of the within-named Court,
at _____
on _____ 20____, at _____ M.

Dated:

**PERRY, VAN ET TEN, ROZANSKI &
PRIMAVERA, LLP**

Attorneys for

30 BROAD STREET, THE 44TH FLOOR
NEW YORK, NEW YORK 10004
(212) 406-9710

To:

Attorney(s) for